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IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

)	No. C 06-5288 MHP
SIERRA CLUB,)	
)	STIPULATION TO THE ENTRY OF AN
Plaintiff,)	ORDER EXTENDING TIME FOR
)	DEFENDANT UNITED STATES TO
v.)	RESPOND TO COMPLAINT AND TO
)	CONTINUE INITIAL DISCOVERY
UNITED STATES ENVIRONMENTAL)	AND CASE MANAGEMENT
PROTECTION AGENCY,)	CONFERENCE
)	
Defendant.)	
)	

Pursuant to Local Rules 6-2 and 7-12, Plaintiff Sierra Club and Defendant United States Environmental Protection Agency ("EPA"), by and through their undersigned counsel, hereby stipulate the entry of an order that extends by 45 days – to January 15, 2007 – the United States' deadline for responding to Plaintiff's Complaint.

The parties further stipulate to the entry of an order to continue from December 11, 2006 to January 29, 2007 their deadline to file initial disclosures, to file a Case Management Statement, and to file a Rule 26(f) Report. Last, the parties stipulate to the entry of an order to continue from December 18, 2006 to February 5, 2007, the initial case management conference.

The parties are currently engaged in settlement discussions and believe the additional

time will be sufficient for them to determine whether this matter can be resolved amicably. No previous requests for extensions of time have been filed. The parties believe the 45 day extension will not adversely affect the schedule of this case.

FOR PLAINTIFF SIERRA CLUB:

s/ Reed Zars
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Dated: December 1, 2006

FOR DEFENDANT EPA:

s/ Pamela S. Tonglao
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Dated: December 1, 2006

PURSUANT TO STIPULATION, IT IS SO ORDERED.

12/5/06

DATED


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing STIPULATION TO THE ENTRY OF AN ORDER TO EXTEND TIME FOR DEFENDANT UNITED STATES TO RESPOND TO COMPLAINT AND TO CONTINUE INITIAL DISCOVERY AND CASE MANAGEMENT CONFERENCE was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

December 1, 2006

s/ Pamela S. Tonglao
Pamela S. Tonglao